

1 IN THE UNITED STATES DISTRICT COURT  
2

3 FOR THE EASTERN DISTRICT OF VIRGINIA  
4

5 RICHMOND DIVISION  
6

7 ROBERT DAVID STEELE, et al.,  
8

vs.  
9 Plaintiff,  
10

JASON GOODMAN, et al.,  
11

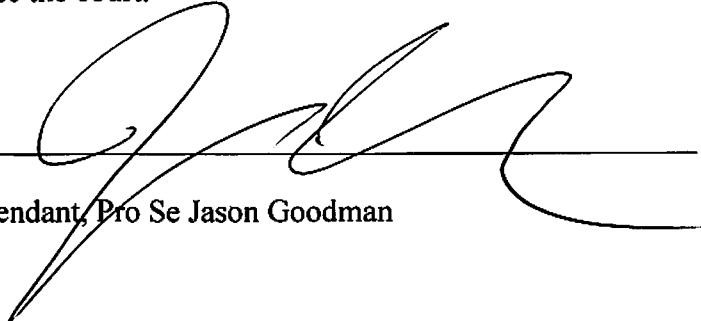
Defendant  
12

Case No.: 3:17-cv-00601-MHL  
13

14 DEFENDANT'S SWORN STATEMENT  
15

16 I hereby attest that the pleadings herein are accurate and true under penalties of perjury.  
17 Further, I hereby attest that the attached exhibits are accurate and true copies of source  
18 documents as described. Video and telephone recording transcripts may contain typos due to  
19 voice to text transcription software. True and accurate copies of original video and audio  
20 recordings can be provided should it please the court.

Signed this 26 day of June 2019

21   
22 Defendant, Pro Se Jason Goodman  
23

24 Jason Goodman, Pro Se  
25 252 7<sup>th</sup> Avenue Apt 6s  
26 New York, NY 10001  
27 [truth@crowdsourcethetruth.org](mailto:truth@crowdsourcethetruth.org)  
28

1 IN THE UNITED STATES DISTRICT COURT  
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3 FOR THE EASTERN DISTRICT OF VIRGINIA  
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5 ROBERT DAVID STEELE, et al., Case No.: 3:17-cv-00601-MHL  
6 Plaintiff,  
7 vs.  
8 JASON GOODMAN, et al.,  
9 Defendant

DEFENDANT'S RESPONSE TO  
PLAINTIFF'S MOTION FOR RULE 11  
SANCTIONS

11 **DEFENDANT'S RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS**  
12

13 Comes now, Defendant Goodman, Pro Se, with this response to Plaintiff's motion for  
14 Rule 11 sanctions. The irony of Plaintiff calling for sanctions is laughable. Defendant has made  
15 every effort to answer the ridiculous, overblown and unfounded claims of Plaintiff in a concise  
16 and professional manner, introducing to the record ONLY facts, evidence and true information in  
17 support of his defense. Defendant would like this matter to be closed without further misuse of  
18 the time and resources of this honorable court and has made every effort to do that. Plaintiff's  
19 instant legal action is a fundamental fraud built on false, baseless and inaccurate claims that are  
20 unsupported by evidence, have no basis in law or fact and fail to state a claim for which relief  
21 can be granted. Defendant stands by his statements regarding Plaintiff and still believes them to  
22 be true and correct and supported by real evidence. In direct response to Plaintiff's motion, the  
23 only fools involved in this matter are the Plaintiff, his attorney, Intervenor Applicant and their  
24 band of co-conspirators, more of which have come forward admitting that the alleged conspiracy  
25 DOES in fact exist. Additional evidence of this conspiracy will be presented in this pleading.  
26  
27  
28

DEFENDANT'S RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 1

## FACTUAL BACKGROUND

- 1           1. According the Merriam-Webster.com the historic, clinical definition of an “idiot” is  
2           someone whose “mental development never exceeds that of a normal child”. To describe  
3           a public figure as an idiot is a clearly understood matter of opinion and although it may  
4           hurt Plaintiff’s feelings, this and similar statements are protected first amendment speech.  
5  
6           2. Plaintiff has publicly stated, without supportive evidence, that *“we actually believe that  
7           there is a colony on Mars that is populated by children who were kidnapped and sent into  
8           space on a 20 year ride. So that once they get to Mars, they have no alternative but to be  
9           slaves on the Mars colony.”* This has been previously cited as evidence in this legal  
10          matter and reprinted in newspapers and websites around the country. While this might be  
11          a statement one could expect a normal, as yet uneducated, or otherwise fanciful child to  
12          make, it is not something we would reasonably expect a well-adjusted adult to say,  
13          particularly not in a public forum on a broadcast to millions. It remains Defendant’s  
14          belief that only a person with no ability to differentiate fact from fantasy, possibly  
15          someone with severe mental illness or otherwise defined as a real idiot would make such  
16          a statement.  
17  
18          3. Plaintiff and his demonstrably unscrupulous attorney have acted in a pattern and practice  
19          which relies on intimidation, threats and initiation of legal action as a method of attack  
20          and / or to achieve political goals rather than actually seeking relief for real damages. In  
21          a video interview with social media personality David Seaman, Plaintiff Steele clearly  
22          articulates this intention (<https://vimeo.com/335290980>) stating *“We are going to take  
23           down YouTube and Google and Facebook and Twitter and Amazon and Wikipedia and  
24           Meetup and then they are all going to pay millions and millions and millions of dollars  
25           26           27           28*

1       *because I am going to personally do my very best to inspire with a legal summit ten*  
2       *thousand lawsuits... ” Plaintiff has been doing his best to make good on his promise to*  
3       *waste public legal resources fighting his own political battles. His attorney, Steven S*  
4       *Biss now represents Congressman Devin Nunes in a series of lawsuits that have been*  
5       *universally derided as baseless attacks on journalism and the first amendment and almost*  
6       *certain to fail on their lack of merits. Biss employs the same overreaching tactics in*  
7       *demanding years of tax returns and other unnecessary documents via discovery which*  
8       *seem clearly intended to reveal personal information about opponents to be used against*  
9       *them, rather than actually seeking relief for a legitimate claim or information directly*  
10      *related to disputed claims in a given action.*

13       (<https://www.fresnobee.com/news/local/article231932983.html>)

- 14      4. Counsel for Plaintiff is in a regular practice of attempting to overwhelm legal opponents  
15      with inappropriate legal action and huge unfounded financial demands for claimed  
16      damages. It is Defendant’s belief that this method is intended to intimidate opponents  
17      and frighten them into submission, very likely through arbitrated settlement or to  
18      otherwise break the financial back of an opponent by forcing them to retain counsel, also  
19      ultimately resulting in a settlement. Defendant has thwarted this by responding pro se and  
20      now it seemingly appears the often-censured attorney Biss seeks to confound the  
21      Defendant with elements of legal process and by failing to adhere to the most significant  
22      rules of procedure, most recently in his improper scheduling of 26f conference. Biss sent  
23      a confirmation email to jasongoodman72@protonmail.com. This is NOT an email  
24      address provided by Defendant. This is NOT Defendant’s email address of record with  
25      regard to this or any other matter. This is NOT an email address Defendant has ever

1 communicated with Biss through. This is NOT an email address Defendant has access to.  
2 When no response was received to Biss' request for confirmation, no further attempts  
3 were made to confirm the scheduled time with Goodman. Biss proceeded in bad faith,  
4 knowing Goodman had never specifically said he would be available on the date and time  
5 requested, and Goodman was in fact, not available to confer at the inappropriately  
6 scheduled time. It is Defendant's belief that this was done purposefully in an attempt to  
7 "get ahead" of Defendant with time consuming legal process which might overwhelm  
8 and deadlines which Biss may have hoped Goodman would miss, resulting in default or  
9 some other advantage for Plaintiff.

- 10
- 11
- 12 5. Biss was sanctioned by a three judge panel of the circuit court on November 20, 2008 for  
13 his role in a "corporate and securities matter, in which he violated professional rules that  
14 govern competence, scope of representation, and misconduct that involves  
15 **DELIBERATELY WRONGFUL ACTS** [emphasis added] that reflect adversely on his  
16 fitness to practice." This is a stern censure and speaks directly to attorney Biss' conduct  
17 in this instant legal matter. Defendant directly questions Biss' fitness to practice law or  
18 even abide by it.
- 19
- 20 6. During the one year and one-month period of suspension resulting from the above  
21 referenced matter, Biss again totally disregarded the law, the orders of the court and any  
22 semblance of ethics by continuing "to negotiate with an insurance company on behalf of  
23 a client in a personal injury matter." For this violation, Biss was sanctioned for another  
24 30 days, and again the court found this to be "misconduct that reflects adversely on the  
25 lawyer's fitness to practice"
- 26
- 27
- 28

- 1       7. On October 18, 2010, the Virginia State Bar Disciplinary Board issued a public  
2                  reprimand to Biss for violating a professional rule that governs conflict of interest  
3                  involving a former client. This was an agreed disposition of misconduct charges.  
4
- 5       8. On July 24, 2017 in a matter brought by the New York State Department of  
6                  Environmental Conservation, Steven Scott Biss and his corporation BissCo were found to  
7                  have committed violations of Articles 17 and 27 of the Environmental Conservation Law  
8                  of the State of New York and Title 6 of the Official Compilation of Codes, Rules and  
9                  Regulations of the State of New York (6 NYCRR) Parts 360, 372, 374, 612, 613, and  
10                 614. A civil penalty of one hundred twenty-two thousand two hundred fifty dollars  
11                 (\$122,250) was assessed against Biss and BissCo jointly and severally. These actions  
12                 speak collectively to the integrity, demeanor and general conduct of Steven Scott Biss,  
13                 both as an unfit to practice attorney and an immoral person. They illustrate an individual  
14                 who is willing to do whatever he chooses and whatever is necessary to achieve his  
15                 desired outcome, irrespective of the law, the public health, the truth, facts or ethics. He  
16                 has demonstrated a pattern and practice of deceptive, shameful actions characterized by  
17                 dishonesty throughout his career that according to court rulings, call his fitness to practice  
18                 law into question. It is Defendant's hope that this honorable court will keep these  
19                 important facts in mind when considering the false and outrageous claims of Plaintiff and  
20                 his totally out of control counsel.  
21
- 22       9. Throughout the course of Plaintiff's solicitation of \$250,000 (two hundred fifty thousand  
23                 dollars) in charitable contributions to his 501(c)(3) tax exempt corporation, and even to  
24                 this very day, Plaintiff claims to have written the NATO Open Source Intelligence  
25                 Handbook despite adamant, credible claims to the contrary. The retired Four-Star U.S.  
26  
27

1 Army General who was in charge of the NATO Southern Atlantic Command at the time  
2 of the book's publication has declared Plaintiff's claim "ridiculous" and false. In a  
3 telephone interview published on May 1, 2019, Kernan states with no equivocation,  
4 Plaintiff's claim of authorship is ridiculous. (**EXHIBIT A**) Defendant has no reason to  
5 doubt the General's testimony and many to doubt Plaintiff's. Defendant remains  
6 confident in his statement that Plaintiff's claims of writing the Open Source Intelligence  
7 Handbook are false, or at least materially misleading. Using such a false claim to entice  
8 the public to donate to a 501(c)(3) tax exempt corporation is of course charity fraud.  
9

10. Throughout the course of his solicitation of \$250,000 (two hundred fifty thousand  
11 dollars) in charitable contributions to his 501(c)(3) tax exempt corporation, Plaintiff  
12 claimed to have been "nominated" for a Nobel Peace Prize. The only supportive  
13 evidence to substantiate this claim is a PDF document authored by Plaintiff himself,  
14 posted to his own web site ( [https://robertdavidsteele.com/wp-](https://robertdavidsteele.com/wp-content/uploads/2015/12/NOMINATION-FOR-THE-NOBEL-PEACE-PRIZE-Robert-David-Steele.pdf)  
15 [content/uploads/2015/12/NOMINATION-FOR-THE-NOBEL-PEACE-PRIZE-Robert-](https://robertdavidsteele.com/wp-content/uploads/2015/12/NOMINATION-FOR-THE-NOBEL-PEACE-PRIZE-Robert-David-Steele.pdf)  
16 [David-Steele.pdf](https://robertdavidsteele.com/wp-content/uploads/2015/12/NOMINATION-FOR-THE-NOBEL-PEACE-PRIZE-Robert-David-Steele.pdf) ). Plaintiff has even suggested during this legal proceeding that  
17 Defendant should have KNOWN Defendant's own statements to be false, because  
18 according to Plaintiff the true facts are contained in this document on Plaintiff's website.  
19 Even a cursory examination of the document's properties (**EXHIBIT B**) reveals the  
20 "nomination" was in fact written by Plaintiff himself using a nine-year-old version of  
21 Microsoft Word and an equally antiquated revision of Adobe Acrobat. Since the start of  
22 this legal action, and Defendant's vehement public proclamations of Plaintiff's extensive  
23 fraud, Plaintiff has taken to revising his language on this particular talking point,  
24 referring to it as a "recommendation" for the Nobel prize nomination rather than an actual  
25

1 nomination. This change was made AFTER nearly \$10,000 was contributed to Plaintiff's  
2 501(c)(3) by members of Defendant's viewing audience and after doubts with regard to  
3 the veracity of the initial claim were raised in regard to this lawsuit. It is Defendant's  
4 belief that Plaintiff has made this revision because Plaintiff is fully aware that falsifying  
5 his credentials or falsely embellishing his resumé to entice charitable donations IS  
6 CHARITY FRAUD. No actual evidence of a Nobel Peace Prize nomination has been  
7 shown and none exists to the best of Defendant's knowledge. Defendant stands by his  
8 statements that Plaintiff is both an idiot and a fraud.

- 10
- 11 11. During a YouTube broadcast that has since been removed from the internet, Plaintiff has  
12 publicly declared that discovery in this instant legal action has informed him that  
13 Defendant is paid by Israeli Mossad, this is categorically false. The improperly  
14 scheduled 26f conference did not take place until May 2019, and no documentation has  
15 been produced as yet. Plaintiffs comments were made months prior to May 2019 and  
16 Defendant has never received any funding or any payments whatsoever from Israeli  
17 Mossad or any related entities to the best of Defendant's knowledge. This is one of the  
18 key themes propagated by various members of the conspiracy to defame Defendant.  
19
- 20 12. As previously submitted in these proceedings, (ECF No. 78 EXHIBIT I) Intervenor  
21 Application D. George Sweigert, telephone Manuel Chavez III, making substantially the  
22 same claim, falsely stating that Defendant Goodman was paid by Black Cube  
23 (<http://www.blackcube.com>) a private intelligence firm in the UK comprised of former  
24 Mossad agents and operatives, according to their own public website.  
25
- 26 13. On or around June 2019, Manuel Chavez III voluntarily shared some of his personal  
27 emails with Defendant. Among these were messages Chavez claims are communications  
28

1 from Thomas Shoenberger, an individual unknown to Defendant who may in fact be  
2 highly placed in the organization of the monetized conspiracy to harass and defame  
3 Defendant Goodman. The emails from Shoenberger provide talking points for a plan to  
4 attack Defendant Goodman's reputation with false allegations claiming Goodman is an  
5 agent of Israel and / or paid by Mossad.

6  
7 14. Additionally, Chavez provided communications between Plaintiff, Chavez, Thomas  
8 Shoenberger and Tanya Cornwell the wife of counsel for Plaintiff, Steven Biss.

9 (EXHIBIT C) This email provides evidence that counsel for Plaintiff Biss is using his  
10 wife as a "cutout" or conduit through which he can indirectly communicate with the co-  
11 conspirators and still provide the plausible claim that "I haven't spoken with (fill in the  
12 name)". This email provides substantial evidence of the conspiracy alleged by  
13 Defendant. A transcript of a publicly broadcast multiparty phone conversation between  
14 Simpsons, Chavez, Intervenor Applicant and others has been submitted as evidence  
15 previously in this matter (ECF No. 78 EXHIBIT A).

16  
17 15. Chavez provided an email between Plaintiff and Chavez in which Plaintiff admits he is in  
18 direct contact with alleged co-conspirator Tyroan Simpson, (EXHIBIT D) and seeks  
19 approval from Biss' wife Tanya for communicating with Simpson against Biss'  
20 instructions. It would seem Biss had advised Steele not to communicate with Simpson in  
21 an effort to hide their collaboration and provide further evidence of conspiracy.

22  
23 16. In the rule 11 motion, Plaintiff has expressed incredulity at the fact that the mere filing of  
24 this legal action, in absence of a judgment, has not stopped Goodman from producing  
25 broadcasts that address Plaintiff's abuse of the legal system, Plaintiff's multiple frauds on  
26 the public and Plaintiff's ongoing efforts to harass and intimidate Goodman, Goodman's

1 talk show guests and audience. Goodman continues to report and comment on the  
2 activities of Plaintiff and his associates as they are matters of public interest.

3 17. Plaintiff's motion for rule 11 sanctions against Goodman has no basis in fact or law and  
4 is yet another in a long series of intimidation tactics intended to distract Defendant from  
5 investigative journalism, derail Defendant's reporting on alleged wrongdoing by Plaintiff,  
6 and otherwise result in gaining some advantage over Defendant with regard to this legal  
7 action.

8 18. Goodman made statements regarding Biss' association with Congressman Devin Nunes  
9 based on information and belief that those statements were true and correct. Goodman  
10 remains consistent in that belief. A journalistic source close to Nunes told Goodman  
11 directly that Biss was recommended to Nunes by Steele. Shortly after filing the suit  
12 against Twitter, Nunes made an appearance on Fox News  
13 ([https://www.youtube.com/watch?v=U1\\_c860YIPc](https://www.youtube.com/watch?v=U1_c860YIPc)) in which he repeated Plaintiff's  
14 talking points as articulated in the above referenced David Seaman interview, claiming  
15 multiple lawsuits would be filed against Twitter, Google and others. Goodman's claim  
16 was made in good faith, and Goodman believes to this day that Plaintiff either directly or  
17 indirectly recommended Biss to Nunes or otherwise played some role in connecting the  
18 two parties and / or has influence over Nunes' suit via interaction with Biss. Intervenor  
19 Applicant has made numerous public calls in now deleted YouTube broadcasts for  
20 Congress to open an investigation into the incidents at the Port of Charleston on June 14,  
21 2017, despite the FBI's completion of a full investigation. Intervenor Applicant has also  
22 publicly proclaimed Devin Nunes will now be somehow compelled to act in response to  
23 this instant legal matter. Furthermore, the Nunes/Biss Twitter lawsuit has been  
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1 universally derided by legal experts on both sides of the political fence for numerous  
2 shortcomings, improprieties and obvious legal missteps. Both Twitter and the one non-  
3 fictional co-defendant have pointed out that filing in VA state court represents possible  
4 venue shopping and / or publicity efforts but is not the appropriate venue given Nunes  
5 California residency, Twitter's primary business location and a stipulation in the Twitter  
6 EULA that all civil matters are to be adjudicated in California. These substantial  
7 deficiencies aside, legal experts consider the action virtually guaranteed to fail given  
8 Twitter and all social media networks are currently protected by CDA 230 and suits of  
9 this nature have not succeeded since the Digital Millennium Copyright Act came into  
10 being in the late 1990s. Any legitimate lawyer with an honest claim should be aware of  
11 this, as should any competent member of Congress. A more sensible approach would be  
12 to advise a sitting Congressman to introduce legislation to address shortcomings in the  
13 arguably obsolete statute as Senator Josh Hawley has done, just this past week.

14 (<https://www.hawley.senate.gov/senator-hawley-introduces-legislation-amend-section-230-immunity-big-tech-companies>) Based on these facts it is Defendant's belief that  
15 Counsel for Plaintiff has an ulterior motive in representing Mr. Nunes, possibly as simple  
16 and bilking the a potentially gullible representative for money and / or publicity. It  
17 should also be noted that the Nunes/Biss suit against Twitter contains allegations against  
18 journalists who have authored unfavorable news items about representative Nunes and  
19 has already been amended to eliminate the false claim that specific words in a journalist's  
20 tweet where highlighted in bold type. In a recent Fox News interview,  
21 (<https://www.techdirt.com/articles/20190411/15061441985/devin-nunes-admits-that-his-bogus-defamation-lawsuits-are-really-about-phishing-journalists-sources.shtml>) Mr.

1 Nunes states "I am absolutely sure that they do not want this to get to discovery so that  
2 we find out who their sources are." This statement echoes the underhanded tactics  
3 practiced by Plaintiff and his "unfit to practice" attorney. They have demonstrated a  
4 pattern and practice of threatening adversaries with discovery and then seeking  
5 outrageous overreaching document production in that process. They wield civil legal  
6 measures like a weapon and have frequently spoken about using it to get personal,  
7 sensitive or otherwise protected information from individuals who they perceive as  
8 adversaries. Plaintiff and his attorney falsely believe they can use the discovery process  
9 in a fraudulent civil legal matter to pierce the armor of the U.S. Constitution and  
10 protection of journalistic sources and the American public's right to a free press and  
11 freedom of speech.

14 19. Plaintiff's counsel Steven S. Biss is in the regular practice of flouting the law and  
15 encouraging frivolous and vexatious punitive legal action against unfavorable journalists  
16 in direct conflict with the first amendment right to free speech. This tactic was used  
17 against Jake Morphonios, as revealed by Morphonios' name appearing in the original  
18 complaint filed in this matter. (ECF No. 1 page 32 paragraph 26). This error reveals Biss'  
19 cut and paste approach to bringing vexatious and frivolous suits against journalists or  
20 those seeking to do legitimate investigation into the activities of the clients he represents.  
21

22 20. Another email provided by Manuel Chavez III reveals not only that Biss' wife Tanya  
23 Cornwell, was actively encouraging Chavez to bring suit against Goodman (in lieu of  
24 Steele doing so) she is in fact the actual author of the Morphonios lawsuit, and therefore,  
25 conceivably at least partly due credit for authoring the original complaint in this instant  
26 legal action. (**EXHIBIT E**) In this email Cornwell goes as far as stating "I'm guessing a  
27  
28

1 half a million bucks they will throw at you to just make it go away" clearly stating the  
2 intention and expectations of Plaintiff's legal team at the outset of this matter.

3 21. In a video posted to YouTube on June 23, 2019, Manuel Chavez III revealed that a user  
4 with the handle AMABISS had provided him with payments totaling one thousand five  
5 hundred dollars (\$1,500) via Patreon on August 1, 2017 at the exact time frame the  
6 events detailed in this legal matter were taking place. (**EXHIBIT F**) Chavez has  
7 confirmed that username AMABISS is Tanya Cornwell, wife of counsel for Plaintiff  
8 Steven S. Biss.

9 22. Plaintiff Steele has directly and publicly interacted with George Webb Sweigert, brother  
10 of Intervenor Applicant both on video  
11 (<https://www.youtube.com/watch?v=hMJoAO5OZY8>) and via email as presented in ECF  
12 No. 78 Exhibit O)

13 23. Plaintiff Steele has directly and publicly interacted with Manuel Chavez III on several  
14 occasion including on videos still viewable on YouTube  
15 ([https://www.youtube.com/watch?v=\\_Xtz\\_S0tH1g](https://www.youtube.com/watch?v=_Xtz_S0tH1g)). Plaintiff has also privately  
16 communicated with Chavez in a clandestine manner via email as revealed by Manuel  
17 Chavez earlier this week.

18 24. Chavez is an associate of Intervenor Applicant and has been paid by Intervenor Applicant  
19 and has received direct instructions from Intervenor Applicant. Intervenor Applicant  
20 operates a YouTube channel under the account name "Prepper Kitty Intel PKI". Many  
21 exhibits in this instant legal matter have referenced this YouTube account. YouTube  
22 username Prepper Kitty Intel has paid Chavez via YouTube Superchat (**EXHIBIT G**)  
23

1       25. Intervenor Applicant has directly and publicly interacted with George Webb Sweigert,  
2                   Manuel Chavez III, and Tyroan Simpson, evidence of these communications has been  
3                   provided previously in these pleadings.

4       26. According to pleadings and public statements by Intervenor Applicant he has interacted  
5                   with Susan Lutzke/Holmes privately in revealing the identity of O. Marshall Richards  
6                   and other matters.

7       27. According to statements by Susan Lutzke/Holmes she has interacted with Intervenor  
8                   Applicant privately in revealing the identity of O. Marshall Richards and other matters.  
9  
[10                   \(https://www.youtube.com/watch?v=WwyRPFhW-HE\)](https://www.youtube.com/watch?v=WwyRPFhW-HE)

11       28. Counsel for Plaintiff is in a regular practice of ignoring the law, lying to courts, clients,  
12                   legal adversaries and the public. In 2009, Counsel for Plaintiff had his legal license  
13                   suspended by the VA State Bar Association for one year. Despite this severe measure,  
14                   Biss continued to practice law in direct defiance of the order, earning an extended  
15                   suspension for the transgression. Despite this, Biss continued his unscrupulous and  
16                   unlawful activity. On July 24, 2017, it was determined that both Counsel for Plaintiff and  
17                   a corporation owned by Counsel, Bissco Holdings, Inc (“Bissco”) had violated New York  
18                   State Environmental Conservation regulations. Multiple counts detailed Counsel’s  
19                   improper disposal of hazardous toxic waste and demonstrated Counsel for Plaintiff’s total  
20                   disregard for the law, the environment and the health and safety of the general public.  
21  
[22                   \(https://www.dec.ny.gov/hearings/110879.html\)](https://www.dec.ny.gov/hearings/110879.html). The New York State Department of  
23                   Environmental Conservation was awarded default judgements against Steven S. Biss and  
24                   Bissco In the Matter of the Alleged Violations of Articles 17 and 27 of the Environmental  
25                   Conservation Law of the State of New York and Title 6 of the Official Compilation of  
26  
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1 Codes, Rules and Regulations of the State of New York (6 NYCRR) Parts 360, 372, 374,  
2 612, 613, and 614. Biss was ordered to pay a civil penalty in the amount of one hundred  
3 twenty-two thousand two hundred fifty dollars (\$122,250). (DEC Case No. R5-  
4 20120627-2006)

5 29. Defendant Goodman has never been sanctioned, arrested, accused or charged of any  
6 crimes or legal wrongdoing, prior to the allegations of Plaintiff.

7 30. In Plaintiff's Motion for rule 11 sanctions, Plaintiff claims to have never had any  
8 communication with Intervenor Applicant, but then immediately contradicts this claim,  
9 stating he has received email communications from Intervenor Applicant. The motion  
10 goes on to describe counsel for Plaintiff responding to Intervenor Applicant making this  
11 denial of communication and semantic maze to be navigated by anyone trying to  
12 determine if there has or has not been communication between parties and / or  
13 representatives or intermediaries. To clarify Defendant's claim, while it is clear the  
14 alleged co-conspirators have gone out of their way to avoid direct communicaitons  
15 between certain parties, there are common connections that allow indirect  
16 communications which facilitate the alleged conspiracy and circumvent the capabilities  
17 of civil legal matters.

18 31. On July 7, 2017 Plaintiff sent an email communication to George Webb Sweigert, brother  
19 of Intervenor Applicant, stating "A massive law suit is about to be filed against Jason  
20 Goodman by a lawyer who specializes in defamation cases. Manny is the one who will  
21 be in front" (**EXHIBIT H**) Manny is Manuel Chavez III, one of the individuals who was  
22 on the multiparty video chat in which Sweigert agreed to a monetized harassment effort  
23 targeting Defendant as presented here in previous pleadings. This email was sent just  
24

1 three weeks after Tanya Cornwell sent the above referenced email to Manuel Chavez III  
2 encouraging him to sue Defendant Goodman. It is conceivable that Plaintiff intended to  
3 use Chavez as a “cut out” to bring the same type of legal action against Defendant  
4 Goodman, subjecting Goodman to the same legal jeopardy and assumed need to hire  
5 counsel and subsequent financial ruin, without subjecting himself to the risk of fines for  
6 legal fees or other sanctions. It now seems Chavez’ sense of self-preservation prevented  
7 him from complying with this plan and may have led to the break in the relationship, and  
8 dissention in the ranks of the conspirators.  
9

10 **CONCLUSION**  
11

12 To the best of his knowledge, Defendant has made NO false statements and has not  
13 intentionally misrepresented any facts. Defendant has not presented any information or entered  
14 any motions or pleadings for improper purpose, nor to harass, cause unnecessary delay, nor  
15 needlessly increase the cost of litigation. The exact opposite is in fact the truth. Plaintiff has  
16 done each of these things while Defendant has sought to end this matter as quickly and with as  
17 little disruption and wasted resources as possible. For the above stated reasons, Plaintiff’s  
18 motion for rule 11 sanctions should be denied, and Defendant Goodman humbly requests that the  
19 court consider sanctions against Plaintiff and Counsel Biss as the evidence presented in this  
20 pleading speaks for the facts of this matter.  
21

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23  
24  
25  
26   
27 Jason Goodman, Pro Se  
28 252 7<sup>th</sup> Avenue Apt 6s  
New York, NY 10001  
[truth@crowdsourcethetruth.org](mailto:truth@crowdsourcethetruth.org)

**EXHIBIT A**

## Transcript of phone interview with General William Kernan

1  
00:00:00,030 --> 00:00:06,060  
morning general Kernan can you hear me alright? I can yeah okay thank you

2  
00:00:06,060 --> 00:00:14,969  
for speaking with me yeah no problem there's a slight delay what I've

3  
00:00:14,969 --> 00:00:23,519  
basically got a hole in my spinal cord from parachuting and it puts blood on my

4  
00:00:23,519 --> 00:00:32,820  
brain and is basically robbing my my hearing but have trouble fixing this

5  
00:00:32,820 --> 00:00:38,600  
thing so you just have to bear with me here I'm very sorry to hear that

6  
00:00:41,510 --> 00:00:45,210  
well just something I got to deal with yeah

7  
00:00:45,210 --> 00:00:50,789  
before we begin, since I have your permission to record the call as I can

8  
00:00:50,789 --> 00:00:55,620

9  
00:00:55,620 --> 00:00:58,340

10  
00:00:58,340 --> 00:01:01,720  
Yeah sure no problem

11  
00:01:01,720 --> 00:01:05,060

1 okay

2 have you had an opportunity to review 12

3 00:01:05,180 --> 00:01:10,320

4 this document background information on Robert David Steele and the other people

5 13

6 00:01:10,320 --> 00:01:18,689

7 were going to talk about yeah I did review what you sent me today had an

8 14

9 00:01:18,689 --> 00:01:29,090

10 opportunity to to look through it little convoluted here is what appears to be a

11 15

12 00:01:29,090 --> 00:01:35,880

13 real screwy situation with this guy you know yeah so you don't recognize this

14 16

15 00:01:35,880 --> 00:01:40,020

16 individual you never worked with him in the development of the NATO open-source

17 17

18 00:01:40,020 --> 00:01:47,520

19 intelligence handbook as he claims

20 I do not know this guy as far as I know

21 18

22 00:01:47,520 --> 00:01:54,500

23 I may have run across him but I do not know Steele or any of the other people

24 19

25 00:01:54,509 --> 00:02:00,080

26 that that you sent me information on right but of course in the book the NATO

27 20

28 00:02:00,090 --> 00:02:04,680

open-source intelligence handbook you reference this open source solutions

21

00:02:04,680 --> 00:02:09,680

company as a contributor is that correct?

22

00:02:09,680 --> 00:02:20,760

the the pamphlet that that was done by SACLANT was a collaborative effort by  
DEFENDANT'S RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 17

1  
23

3 00:02:20,770 --> 00:02:30,390

4 the the SACLANT staff which of course was a multinational staff that was done

5  
24

6 00:02:30,390 --> 00:02:41,560

7 for the the joint and multinational command that that I commanded of course

8  
25

9 00:02:41,560 --> 00:02:47,620

10 I put the forward on it I was asked if I wrote that I did not it was a

11  
26

12 00:02:47,620 --> 00:02:55,240

13 collaborative effort by by the SACLANT staff right and in this paragraph

14  
27

15 00:02:55,240 --> 00:03:01,540

16 in your forward you say this publication has benefited greatly from the continued

17  
28

18 00:03:01,540 --> 00:03:07,810

19 collaboration between my staff and the staff of open source solutions inc I

20  
29

21 00:03:07,810 --> 00:03:12,880

22 think this is the main source of disagreement between Robert David Steele

23  
30

24 00:03:12,960 --> 00:03:20,260

25 and the reporting that we've done he claims that he is somehow part of open

26  
31

27 00:03:20,260 --> 00:03:28,520

28 source solutions but I'm unable to find

29 any information online to corroborate what he says

30  
32

31 00:03:30,720 --> 00:03:38,860

32 well I know nothing about Steele having anything to do with writing this and I

33  
35

36 00:03:38,860 --> 00:03:47,010

37 saw where he claimed that he wrote 85% of this I find that very hard to believe

38 DEFENDANT'S RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 18

1 34

2  
3 00:03:47,010 --> 00:03:53,680

4 unquestionably we do use contractors from time to time but given the type of

5 35

6 00:03:53,680 --> 00:03:58,720

7 document of course I'm going back eighteen years now but given the type of

8 36

9 00:03:58,720 --> 00:04:04,600

10 document that that was we would have used the subject matter experts from the

11 37

12 00:04:04,600 --> 00:04:09,580

13 SACLANT staff to put that document together so the notion that one

14 38

15 00:04:09,580 --> 00:04:14,680

16 individual would have written 85% of it is not compatible with what you're

17 39

18 00:04:14,680 --> 00:04:17,380

19 describing right?

20 40

21 00:04:17,460 --> 00:04:24,160

22 oh no

23 I find it highly unlikely that one

24 41

25 00:04:24,360 --> 00:04:31,000

26 person could have written that it is too complex a document for one individual to

27 42

28 00:04:31,000 --> 00:04:35,120

have written that too many different disciplines and things like that this is

43

00:04:35,220 --> 00:04:39,300

a document over 50 pages

44

00:04:39,300 --> 00:04:42,060

I'm sorry say that again

DEFENDANT'S RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 19

1 45

2 00:04:42,060 --> 00:04:44,600

3 it's a it's a lengthy document over 50 pages and I

4 46

5 00:04:44,720 --> 00:04:49,759

6 presume it covers too many different subjects for one person to have written

7 47

8 00:04:49,759 --> 00:04:55,220

9 the whole thing that's correct

this would have been this would have

10 48

11 00:04:55,220 --> 00:05:02,330

12 been done by various people within the staff that had staff expertise in the

13 49

14 00:05:02,330 --> 00:05:08,660

various areas of that of that document it was like I said it would have been a

15 50

16 00:05:08,660 --> 00:05:13,460

collaborative effort it would have been staffed numerous times within the within

17 51

18 00:05:13,460 --> 00:05:20,160

19 the headquarters and then subsequently approved by the by the chief of staff

20 52

21 00:05:20,160 --> 00:05:27,460

before it went to me for final approval mm-hmm and do you recall speaking well

22 53

23 00:05:27,470 --> 00:05:32,060

24 sorry it was an email communication with this person who presented herself as Pat

25 54

26 00:05:32,060 --> 00:05:39,260

Ingraham who I believe is Susan Lutzke you remember that email exchange right?

27 55

28 00:05:39,280 --> 00:05:47,380

Yeah, I just vaguely remember that that conversation or email

DEFENDANT'S RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 20

1  
2 56  
3 00:05:47,380 --> 00:05:52,340

3 I don't recall whether it was a  
4 telephone conversation or an email but I

5 57  
6 00:05:52,340 --> 00:05:58,130  
7 was basically asked if if I wrote that and I think I told her or the same thing

8 58  
9 00:05:58,130 --> 00:06:06,500  
10 that all I did was put the forward on it that this was a staff effort by by

11 59  
12 00:06:06,500 --> 00:06:10,460  
13 SACLANT yeah  
14 separately I've been in touch with Susan

15 60  
16 00:06:10,460 --> 00:06:14,820  
17 Lutzke she's shared the email between you and

18 61  
19 00:06:14,820 --> 00:06:19,460  
20 her that's how I got your email address that's how you and I got in touch for

21 62  
22 00:06:19,460 --> 00:06:23,020  
23 this phone call so I believe she was deceiving you there and I'm not sure

24 63  
25 00:06:23,020 --> 00:06:28,180  
26 exactly what her purpose was but she is not Pat Ingraham

27 64  
28 00:06:29,160 --> 00:06:33,520  
29 Yeah I was very surprised

30 65  
31 00:06:33,620 --> 00:06:42,620  
32 when I got that that request from her these documents these manuals and staff

33 66  
34 00:06:42,620 --> 00:06:51,080  
35 DEFENDANT'S RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 21

1 documents are always done as a collaborative effort by the staff you

2 67

3 00:06:51,080 --> 00:06:58,099

4 know as a commander I might sign off on it to bring attention to the fact that

5 68

6 00:06:58,099 --> 00:07:04,580

7 this is an important document and approved at at the headquarters level

8 69

9 00:07:04,580 --> 00:07:13,130

10 but obviously it's not something that that me as the commander wrote right and

11 70

12 00:07:13,130 --> 00:07:17,900

13 would you have directly interfaced with individuals who did write it or you're

14 71

15 00:07:17,900 --> 00:07:21,820

16 just sort of overseeing it as a project?

17 72

18 00:07:22,380 --> 00:07:33,560

19 right okay hang on just a minute my phone that captures your voice

20 73

21 00:07:33,560 --> 00:07:42,340

22 message is being delayed but... I can rephrase I don't know why this

23 74

24 00:07:42,340 --> 00:07:50,500

25 individual would indicate that he wrote this because these these type

26 75

27 00:07:50,500 --> 00:07:58,140

28 manuals are always something that that is done at a staff level I see I see

76

00:07:58,160 --> 00:08:04,510

and the third individual David George Sweigert retired US Air Force and

77

00:08:04,510 --> 00:08:09,900

contract employee of various agencies have you ever seen this guy before?

DEFENDANT'S RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 22

1 78

2 00:08:11,060 --> 00:08:14,740

3 I don't know this individual at all

4 79

5 00:08:14,780 --> 00:08:21,100

6 yeah I mean I you know you've got good pictures on him and everything else

7 80

8 00:08:21,100 --> 00:08:29,150

9 obviously somebody that also was a defense contractor from time to time he

10 81

11 00:08:29,150 --> 00:08:33,560

12 could have been in the headquarters but I never I never recalled meeting him or

13 82

14 00:08:33,560 --> 00:08:40,920

15 seeing him

16 could've he had a a periodic contract

17 83

18 00:08:40,920 --> 00:08:45,660

19 at Booz Allen Hamilton or somebody like that working in the headquarters yes but

20 84

21 00:08:45,660 --> 00:08:50,130

22 I don't I don't remember ever meeting him of course I'm just trying to

23 85

24 00:08:50,130 --> 00:08:54,300

25 determine why these individuals would have selected this book I mean they're

26 86

27 00:08:54,300 --> 00:09:01,019

28 so persistent in their efforts to stop me from reporting on things their

87

00:09:01,019 --> 00:09:06,600

explanation of simply not liking my news program can't possibly be the real

88

00:09:06,600 --> 00:09:11,550

explanation for their multiple lawsuits they've brought against me and constant

1 89  
2 00:09:11,560 --> 00:09:15,020

2 harassment and defamation

3 so listen General thank you very much

4 90  
5 00:09:15,020 --> 00:09:18,320

6 for your time I think that's really all I needed to ask you I really appreciate

7 91  
8 00:09:18,320 --> 00:09:25,320

9 you sharing that information with me and I hope you feel alright and can get

10 92  
11 00:09:25,320 --> 00:09:28,000

some treatment for this condition

12 93  
13 00:09:28,900 --> 00:09:32,380

yes it's always upsetting when

14 94  
15 00:09:32,380 --> 00:09:38,000

people take credit for other people's work why somebody unless they're just

16 95  
17 00:09:38,000 --> 00:09:46,860

18 trying to fatten their resume by taking credit for something like this is beyond

19 96  
20 00:09:46,860 --> 00:09:52,290

me why somebody would try to take this credit but it's this is obviously a

21 97  
22 00:09:52,290 --> 00:10:00,860

23 staff document that was worked for months and approved by a multinational  
24 98  
25 00:10:00,860 --> 00:10:10,380

headquarters so I it's just absolutely beyond a doubt something that the

26 99  
27 00:10:10,380 --> 00:10:15,920

headquarters put together are not one

28 individual I understand it's too complicated a document

DEFENDANT'S RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 24

100

00:10:15,920 --> 00:10:20,880

yeah one last question with regard to the lawyer representing mr. Steele this

101

00:10:20,880 --> 00:10:25,680

Steven s Biss as I mentioned in the document I have reason to believe that

102

00:10:25,680 --> 00:10:30,750

Robert David Steele has put Biss in touch with the House Intelligence

103

00:10:30,750 --> 00:10:36,320

Committee ranking member Devon Nunez and has encouraged Nunez to bring a lawsuit

104

00:10:36,320 --> 00:10:42,880

against the software company social media giant Twitter and various

105

00:10:42,880 --> 00:10:49,180

co-defendants I have reason to suspect Biss is in a regular practice of

106

00:10:49,190 --> 00:10:53,380

engaging in these fraudulent lawsuits and I'm speculating when I say this but

107

00:10:53,390 --> 00:10:58,580

I believe they're targeting mr. Nunez in an effort to damage his reputation

108

00:10:58,580 --> 00:11:04,130

because I've read their lawsuit and it has virtually no hope of succeeding it

109

00:11:04,130 --> 00:11:10,700

has already served to basically be the source of ridicule for mr. Nunez who of

110

00:11:10,700 --> 00:11:15,680

course was closely associated with championing president Trump's claims of

111

DEFENDANT'S RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 25

1 00:11:15,680 --> 00:11:20,120  
2 innocence during the time that the Robert Mueller investigation was going on

3 112

4 00:11:20,120 --> 00:11:24,280  
5 do you have any advice as to what i might be able to do to alert mr. Nunez

6 113

7 00:11:24,280 --> 00:11:29,240  
I've tried contacting his office and no success

8 114

9 00:11:29,520 --> 00:11:31,900  
10 that's very disappointing

11 115

12 00:11:32,800 --> 00:11:34,060  
Yeah

13 116

14 00:11:36,240 --> 00:11:41,320  
any any advice as to what I might be able to do do you have any contacts who

15 117

16 00:11:41,320 --> 00:11:47,360  
17 could possibly raise an alert to mr.  
Nunez as to the activities of these individuals?

18 118

19 00:11:48,200 --> 00:11:54,660  
20 I don't the only thing that  
I could possibly suggest that there

21 119

22 00:11:54,660 --> 00:12:02,960  
23 there may be still a staff trail within SACLANT headquarters of the staffing

24 120

25 00:12:02,960 --> 00:12:08,030  
of that document even though it's 18 years ago there still could be in the

26 121

27 00:12:08,030 --> 00:12:13,700  
28 files you know those things are pretty heavily staffed within the headquarters

1 122

2 00:12:13,700 --> 00:12:21,290

3 and there may be something still in the files and in SACLANT the staffing of

4 123

5 00:12:21,290 --> 00:12:26,680

6 that document even though it was 18 years ago to show how that thing was

7 124

8 00:12:26,690 --> 00:12:34,460

9 ultimately approved well yeah I don't know that it would be necessary to go to

10 125

11 00:12:34,460 --> 00:12:40,100

12 those lengths I think your statements here definitely serve to counteract

13 126

14 00:12:40,100 --> 00:12:45,080

15 Robert David Steele's ridiculous claims and I definitely appreciate your time

16 127

17 00:12:45,080 --> 00:12:48,480

18 this morning general thank you very much

19 128

20 00:12:48,820 --> 00:12:53,280

21 yeah I mean it is a ridiculous claim but

22 129

23 00:12:53,580 --> 00:12:59,920

24 but if he's trying to take credit for it and and

25 130

26 00:12:59,930 --> 00:13:06,710

27 trying to use that as the defamation of character against you I mean it may be

28 131

131 00:13:06,710 --> 00:13:11,300

another another outlet for you yeah all right well I appreciate that I will

132

00:13:11,300 --> 00:13:15,000

follow up thank you very much sir have a good morning

133

00:13:15,000 --> 00:13:17,340

DEFENDANT'S RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 27

1 okay Jason good luck to you

2 134

3 00:13:17,340 --> 00:13:19,860

4 take care

5

6

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DEFENDANT'S RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 28

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2 EXHIBIT B  
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Robert David Steele

**NOMINATION FOR THE NOBEL PEACE PRIZE**

Robert David Steele

*For leadership in redirecting the craft of intelligence (decision-support) away from spies and secrecy enabling war and waste, toward open sources and methods favorable to peace and prosperity.*

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Author: RobertSteele  
Subject:  
Keywords:

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PDF Producer: Microsoft® Word 2010 PDF Version: 1.5 (Acrobat 6.x)  
Location: Macintosh HD:Users:jasongoodman:Documents:RDS lawsuit:  
File Size: 902.46 KB (924,120 Bytes)  
Page Size: 8.50 x 11.00 in Number of Pages: 10  
Tagged PDF: Yes Fast Web View: No

PEACE PRIZE

ele

DEFENDANT'S RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 29

1 EXHIBIT C  
2  
3  
4



5  
6  
7 From: Defango TV defango@gmail.com  
8 Subject: Fwd: HAZMAT  
9 Date: June 18, 2019 at 11:41 AM  
10 To: truth@crowdsourcethetruth.org, dseaman@gmail.com

11 ..... Forwarded message .....

12 From: Robert Steele <robert.david.steele.vivas@gmail.com>  
13 Date: Fri, Jun 30, 2017 at 9:53 PM  
14 Subject: Re: HAZMAT  
15 To: amethystanya <atanya1111@gmail.com>, Th Stg <tstgoer13@gmail.com>  
16 Cc: Defango <Defango@gmail.com>

17 Manny, BEFORE the interview, give me a list of eleven truth tellers. I will name them online as credible sources with you being the top one.

18 On Fri, Jun 30, 2017 at 9:47 PM, amethystanya <atanya1111@gmail.com> wrote.  
19 mango,

20 you are a very articulate voice of reason and the fact you live half your life on camera, makes it almost impossible for anyone to lie about you. It is hard to distinguish who is a lunatic and who is a paid who is an attention whore etc.. the most prolific source of disinfo is media matters, the david brock, lyn rothschild pipeline of horse shit. David seaman knows a lot about this.

21 I think manny, you have a much better idea as to who is an authentic/ genuine than I do. I bought into the david seaman is phony but realized in his interview with you, that I was totally off base.

22 I would give the following people as the people I firmly believe are using their own judgement but I do want to say. I am wrong a lot. BESIDES MANNY my newscasters would be:

23 H. A Goodman  
24 davidT (coffee with dave)

25 MLordandGod

26 virturus libertas

27 William mount

davidseaman

28 Robert wants 12 good people, these are simply the ones I watch, I think manny is in a far better position to determine who those leaders of the community are. that's my viewer preferences. manny is a part of the community, is getting attacked and knows these people and has outside contact with them, I am simply an observer.

It would be cool if you took regular scheduled time to let people submit accounts they suspect to be disinfo, if they are not they can call in and discuss the accusations but go over all the available fact, and let the viewer decide HUMAN or HAZMAT

Normal people do not attack people saying things like 'Defango is a badbad person, I am concerned what he might do to me or my family' that is just not normal. Its also not legal.

because of the medium we have no means to stick a 'CONTAMINATED MATERIALS' label on people.

'until we finish our open source information platform we still have to try to distinguish who is honest'

what evidence is presented

appeals to emotions vs intellect?

attacks others?

is angered by opposition?

grandiose conclusions... is this a huge step for the crowdsource community?

Will not rationally respond to information, when facts are brought up, they will be shout, demean mock but never ever address

scripted story lines/comments

professional production videos (aka morphonius)

entertainment industry connections

attacking discrediting others

no person who watches 'WHO SPOOFED THE SETH RICH FILES' believes him to be authentic. it would be easier to create a new platform that excludes all the rigged data commercials than to separate who is and who is not crazy or paid to be wrong. we all know they are toxic but we cant get rid of them.

it has become FW tribe. we need a NEWTRIPE. You can't run hard and run in a line. right now they don't have a way to in the

1  
2  
3  
4       world, they do that for living. a lawsuit would create more diarrhea , at least slow the 10 posts a day. a suit against each person  
5 who lies about others and the repeaters= the proceeds wculd fund the new thing with the proceeds. each fake actor will have to hire  
6 their own legal team. pay 20k per person. where they get the money to pay their lawyers will come out in discovery= it's a trap!

7       WHAT TO DO TO SCARE THEM:

8       "anyone being harassed and stalked for speaking the truth should send a detailed account of who is cyber harassing  
9 you to unrig? legal. if we get enough people and the right set of facts you will be included in the lawsuits we intend to file to expose  
10 this happening. put 'crowdstalked' in subject line" I can deal with that and write cases and get them filed if needed. this will really  
11 hurt them. Also strongly imply that a new youtube is being created in secret. that will drive them nuts.

12       WHAT PEOPLE CAN DO TO NOT BE PART OF THE PROBLEM  
13 research. books. collect information without deciding right away and being sure. collect a lot of information. If you talk about pi  
14 zzagate, point to the people before you. point out the mountains of evidence that already exists. do not repeat an internet rumor. do  
15 not decide what is true and false based on the words of another alone. trust your gut feeling that you are being lied to but don't  
16 accuse people of things with no evidence.

17       people are worried about George webb so they don't hear about ted gunderson paul bonacci, caradori. This is being done on a  
18 scale that makes hitler look like a novice. hundreds of children go missing from DC each month. make sure they know people have  
19 not forgotten what they are working so hard to distract us from.  
20 Tanya  
21 443 875 6091

22       --  
23       #UNRIG: <http://tinyurl.com/IndieGoGo-UNRIG>  
24 Personal Page: <http://robertdavidsteele.com>  
25 Group Blog: <http://phibetaiota.net>  
26 Donate to Non-Profit: <http://paypal.me/EarthIntel>

27       --  
28 Defango@gmail.com

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3  
**EXHIBIT D**  
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6  
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8  
From: Defango TV <defango@gmail.com>  
Subject: Fwd: Apology again without caveats  
Date: June 18, 2019 at 11:41 AM  
To: truth@crowdsourcethetruth.org, oseaman@gmail.com

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----- Forwarded message -----  
From: Robert Steele <robert.david.steele.vivas@gmail.com>  
Date: Mon, Dec 4, 2017 at 6:28 PM  
Subject: Re: Apology again without caveats  
To: Defango <defango@gmail.com>

should I ask Tyron for the access information? Steve asked me not to contact him. what's the least troubling way to "take possession" of the channel? direct from Tyron?

On Mon, Dec 4, 2017 at 6:27 PM, Defango <defango@gmail.com> wrote:  
In the last month I have generated over 1k in bitcoin posting my content on steemit regularly and using the platform. I have a small channel on steemit with only the posts I have. If you started just copy and pasting your content over to steemit and kept active you could be doing 3 times that with little to no problem. Steemit just a new platform that people are using for good and it doesn't matter if they are old articles of yours, they still will generate incoming on the platform. Its the decentralized platform that your looking for, it has all the things it needed to fully design and use any open source systems. They just need to be created and connected.

On Mon, Dec 4, 2017 at 4:11 PM, Robert Steele <robert.david.steele.vivas@gmail.com> wrote:  
PLEASE calm Tanya for me. You can tell her I am your bitch now (smile)

On Mon, Dec 4, 2017 at 6:00 PM, Defango <defango@gmail.com> wrote:  
Thanks A Lot.

I was not my intention to hurt you, but I just wanted to clear the air for many people and it seems we had good stopping point.  
Bless you for all you have done and I know things are going to be better in the future. Take some time and collect yourself because January is going to be a very busy time for all of us.

The video should be edited down and I will keep myself quite on the subject until it seems like it's safe to talk about it. I'm just going all in on deflecting any negative comments from Goodman's crowd. He fell for a trap I set for him and its not looking good for him.

You just need to start posting on steemit. Sure month one will be nothing, but if you spend the next month moving over content from your website, I can be honest and saying you could be generating over 7k a month and crypto.

On Mon, Dec 4, 2017 at 10:55 AM, Robert Steele <robert.david.steele.vivas@gmail.com> wrote:  
Bless you. I fucked up and it was not at all my intention to be insulting to you. Absolutely NOT

I will do whatever you wish including if you direct me, posting an apology with no caveats at the video (which you can leave up or not as you please) and doing a future live stream or not. I am about to disappear from public view for 30 days, from Saturday.

I will not mention the video again. If asked by another host about it I will say I screwed up and have apologized to you three times, profusely, I was completely in the wrong in how I spoke. Count on me to be honorable with you.

Also, Trevor just reminded me that I had offered you the bus ride, and that is absolutely still yours if you wish. I am waiting on Cynthia to decide about coming back to the USA. I will do an email now cc you that puts this back on the table with her.

On Steemit, I will follow your lead and do whatever you tell me to do.

My heart is lighter for re-connecting with you. It was NEVER my intent to disrespect you or your channel, I was stupid and clumsy.

Robert

On Mon, Dec 4, 2017 at 12:39 PM, Defango <defango@gmail.com> wrote:  
I accept the apology. We will figure what do next

On Dec 4, 2017 6:18 AM, "Robert Steele" <robert.david.steele.vivas@gmail.com> wrote:  
Many

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3 I apologize again, with no caveats. What can I do to make it right? Will hope to hear from you.  
4 Both Steve and Cynthia are united with you and hold me accountable for being completely wrong in this past encounter.  
5 Very respectfully,  
Robert

6 --  
7 #UNRIG Home: <http://unrig.net>  
#UNRIG Donate: <http://tinyurl.com/IndieGoGo-UNRIG>  
Personal Page: <http://robertdavidsteele.com>  
Group Blog: <http://phibetaiota.net>  
Donate to Non-Profit: <http://paypal.me/EarthIntel>

8 --  
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Personal Page: <http://robertdavidsteele.com>  
Group Blog: <http://phibetaiota.net>  
Donate to Non-Profit: <http://paypal.me/EarthIntel>

10 --  
11 [Defango@gmail.com](mailto:Defango@gmail.com)  
12 [REDACTED]

13 --  
14 #UNRIG Home: <http://unrig.net>  
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20 --  
21 [Defango@gmail.com](mailto:Defango@gmail.com)  
22 [REDACTED]

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**EXHIBIT E**  
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(b)7

From: Defango TV defango@gmail.com  
Subject: Fwd: sorry!  
Date: June 18, 2019 at 11:44 AM  
To: truth@crowdsourcethertruth.org, dseaman@gmail.com

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7  
8  
----- Forwarded message -----  
From: amethethanya <atanya1111@gmail.com>  
Date: Sun, Jul 2, 2017 at 8:49 AM  
Subject: sorry!  
To: Defango <Defango@gmail.com>

9  
So I love Robert but he moves way to fast. I was just having lunch and talking about how viewers discern things and why you are the  
best one basically (let's face facts you are a good 50 IQ points > rest) I'm slammed busy with life as I'm sure you are but also with kids  
and a husband (that's like 3 kids) so if him deciding TOMORROW was a pain in your butt I do apologize.

10 I'm sitting here writing defamation cases for my husband for policemen and thinking I can in three days get you a case against  
11 Jason. I'm guessing a half a million bucks they will throw at you to just make it go away = catch it! Robert is the real deal he can go  
to court for you. And will that is cool thing about him. He drove 3 hours to come see me on the farm (terrified honestly) and hung out  
all day, seemingly unaffected my friends showing up and doing bong hits.

12 I had written the most killer case against jake-crisis-actor-morphonius. I will have Nora (maccoby) send you a copy (I cant). They  
13 called her dad a child trafficker, while her whole family is in the hospital (her mom is dying) her brother is a lawyer who reped  
alefantis against david brock in their "divorce" but apparently HE blackmailed BROCK and is NOT a pedo??? just a fudge packer.  
NOT THAT THERE'S ANYTHING WRONG WITH THAT\*\*\*.

14 Max, her brother was the one who eventually would not let her file against morphonius because his corporate overlords didn't want the  
publicity. the lawsuit he is waving around on his channel, I wrote that. Nora had started trying to help Robert get to trump because  
she lives like a few doors down from Pense's guards (I call them spear holders because he is a notorious fag) when her family came  
under intense fire from media matters. THE ONLY person who knew the stuff in the highly produced morphonius pieces was brock.  
anyways then she got in a huge fight with Robert over the pedo thing, the details of which escape me. So I was a little wary with  
helping Robert because I think the attack against her family was because they were trying to help him. and I still want to go after  
media matters, get them off youtube and get the victims of the slander paid.

16 anyways do contemplate suing Jason, he's likely insured. You have a great case.

17 TT

18 \*\*\*totally is lots wrong with it. poop on the sheets for instance.

19 --

20 Defango@gmail.com

EXHIBIT F



## **EXHIBIT G**

1 EXHIBIT H  
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3 ••••• AT&T LTE

4 2:23 PM

5 57% 

6 <  15/19 

7 2 Messages  
Your July 3rd Tour

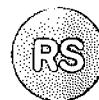
8 ^ v

9 Found in All Mail Mailbox



10 Robert Steele

11 7/7/17



12 To: George Webb

13 Details

14 George, for information. A  
massive law suit is about to be  
filed against Jason Goodman  
by a lawyer who specializes in  
defamation cases. Manny is  
the one who will be in front, my  
case will simply be in support.  
Jason is buried so deep by his  
own words that we expect  
Google to shut him down  
completely -- close his  
channel and delete all of his  
videos. Since the videos  
appear in all states this will be  
a multi-state filing, done pro





**Circuit Court for Eastern Division Virginia****Case No. 3:17-cv-601-MHL**

Robert David Steele and Earth Intelligence Network

City or County

Name					
11005 LANGTON ARMS CT					VS.
Street Address					Apt #
OAKTON,	VA	22124	( 571 )	320-8573	6s
City	State	Zip Code	Area Code	Telephone	Apt #

*Plaintiff*

Name					
Jason Goodman					VS.
Street Address					Apt #
New York	NY	10001	( 323 )	744-7594	6s
City	State	Zip Code	Area Code	Telephone	Apt #

*Defendant*

**CERTIFICATE OF SERVICE  
(DOMREL58)**

I HEREBY CERTIFY that on this 26 day of June, 2019, a copy of the document(s) entitled DEFENDANT'S RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS

Title of Document(s)  
was/were mailed, postage prepaid to:

Steven S Biss

Opposing Party or His/Her Attorney

300 West Main Street Suite 102

Address

Charlottesville  
City

VA

22903

State

Zip

June 26, 2019  
Date

Signature



Circuit Court for Eastern Division Virginia  
City or County

Case No. 3:17-cv-601-MHL

Robert David Steele and Earth Intelligence Network

Name  
11005 LANGTON ARMS CT  
Street Address  
OAKTON, VA 22124 Apt #  
City State Zip Code Area Telephone  
*Plaintiff*

VS.  
Jason Goodman  
Name  
252 7th Avenue  
Street Address  
New York NY 10001 Apt #  
6s  
City State Zip Code Area Telephone  
*Defendant*

**CERTIFICATE OF SERVICE  
(DOMREL58)**

I HEREBY CERTIFY that on this 26 day of June, 2019, a copy  
of the document(s) entitled DEFENDANT'S RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS

Title of Document(s)  
was/were mailed, postage prepaid to:

D. George Sweigert

Opposing Party or His/Her Attorney

PO Box 152

Address

Mesa  
City

AZ State 85211 Zip

June 26, 2019  
Date

Signature

**Circuit Court for Eastern Division Virginia****Case No. 3:17-cv-601-MHL**

Robert David Steele and Earth Intelligence Network

City or County

Name				
11005 LANGTON ARMS CT				
Street Address	Apt #			
OAKTON,	VA	22124	( 571 )	320-8573
City	State	Zip Code	Area Code	Telephone

*Plaintiff*

VS.				
Jason Goodman				
Name				
252 7th avenue	6s			
Street Address	Apt #			
New York	NY	10001	( 323 )	744-7594
City	State	Zip Code	Area Code	Telephone

*Defendant*

### **CERTIFICATE OF SERVICE (DOMREL58)**

I HEREBY CERTIFY that on this 26 day of June, 2019, a copy of the document(s) entitled DEFENDANT'S RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS

**Title of Document(s)**  
was/were mailed, postage prepaid to:

Terry Frank Kaufman & Canoles

Opposing Party or His/Her Attorney

1021 E. Cary Street, 14th Floor

Address

<u>City</u>	<u>Richmond</u>	<u>VA</u>	<u>23219</u>
		<u>State</u>	<u>Zip</u>

June 26, 2019  
Date

Signature

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
DIVISION

ROBERT DAVID STEELE, et al.,

Plaintiff(s),

v.

JASON GOODMAN, et al.,

Defendant(s).

Civil Action Number: 3:17-cv-00601-MHL

**LOCAL RULE 83.1(M) CERTIFICATION**

I declare under penalty of perjury that:

No attorney has prepared, or assisted in the preparation of \_\_\_\_\_

DEFENDANT'S RESPONSE TO  
PLAINTIFF'S MOTION FOR RULE  
11 SANCTIONS

JASON GOODMAN  
Name of Pro Se Party (Print or Type)

Signature of Pro Se Party

Executed on: June 26 2019 \_\_\_\_\_ (Date)

OR

The following attorney(s) prepared or assisted me in preparation of \_\_\_\_\_  
(Name of Attorney) \_\_\_\_\_ (Title of Document)

(Address of Attorney)

(Telephone Number of Attorney)  
Prepared, or assisted in the preparation of, this document

(Name of Pro Se Party (Print or Type))

Signature of Pro Se Party

Executed on: \_\_\_\_\_ (Date)